

**Remarks**

The Office Action mailed July 26, 2005 has been carefully reviewed and the following remarks have been made in consequence thereof.

Claims 1-20 are now pending in this application. Claims 1-20 stand rejected.

The objection to the disclosure is respectfully traversed. The specification has been amended at paragraphs [0002] and [0012] in accordance with the Examiner's suggestions. No new matter has been added. Accordingly, Applicant requests that the objection to the disclosure be withdrawn.

The objection to Claims 18, 19, and 20 is respectfully traversed. Claims 18, 19, and 20 have been amended in accordance with the Examiners suggestions. Accordingly, Applicant requests that the objection to Claims 18, 19, and 20 be withdrawn.

The rejection of Claims 1-7 under 35 U.S.C. § 103(a) as being unpatentable over Zeiser (U.S. 5,115,636) in view of Hollis et al. (U.S. 4,300,774) is respectfully traversed.

Zeiser describes a borescope plug (10) for sealing opposing holes (11 and 13) in opposing walls (9 and 14). The borescope plug includes a narrow axial shaft (12) having a pair of opposing ends (12A and 12B). The first end (12A) includes a semispherical sealing means (32) designed to seat within a conically shaped seal hole (11) defined in the wall (9). The second end (12B) includes a circular base (16) that is slidably mounted within an annular borescope plug housing (20). The second end (12B) is retained in the plug housing (20) by a snap ring (18). A spring (40) positioned within the plug housing (20) is retained therein by a base (16) and the snap ring (18). The spring (40) is positioned against a plug housing back end (48) such that the spring (40) biases the shaft (12) towards the seal hole (11). A travel limiter (42) within the plug house (20) limits compression of the spring (40). A cover plate (76) fastened to the second wall (14) retains the borescope plug (10) in position. The back

end (48) is then manipulated with a common socket wrench to enable insertion and removal of the borescope plug (10). Notably Zeiser does not describe a sealing arrangement that receives an adapter post therethrough and that facilitates absorbing axial and radial movement. Moreover, Zeiser does not describe inserting a probe at least partially into the adapter post.

Hollis et al. describe a removable sealing plug for spaced apart wall structures. The sealing plug (10) includes an axial shaft (12) having a pair of opposing ends (12A and 12B). End (12A) includes a fastening means (14) and a sealing means (16). A second sealing means, such as a plug, (20) mates with the shaft (12). The plug (20) includes a fastening means (22), a sealing means (24), and a mating means (26) for mating with the shaft (12). A compressible spring (30) is coupled to a shaft mating means (18) and positioned between the outer surface of mating means (18) and the inner surface of plug (20). The spring (30) biases the mating means (18) and the plug mating means (26) together. In this position, the shaft (12) and the plug (20) are rotationally engaged such that rotational torque induced to plug (20) is transferred to the shaft (12). Spring (30) also absorbs the axial and transverse movements of shaft (12). In one embodiment, the borescope plug (10) also includes a probe (40) for sensing properties, such as temperature and pressure. Notably Hollis et al. do not describe a sealing arrangement that facilitates absorbing axial and radial movement, but rather Hollis et al. describe that axial and transverse movement are absorbed by a spring, which does not act as the seal, but rather biases two mating surfaces together.

Applicant respectfully submits that obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Zeiser with Hollis et al., or vice versa. As explained by the Federal Circuit, “to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the Applicants.” In re Kotzab, 54 USPQ2d 1308, 1316 (Fed. Cir. 2000). MPEP 2143.01.

Furthermore, as is well established, the mere fact that the prior art structure could be modified does not make such a modification obvious unless the prior art suggests the desirability of doing so. See In re Gordon, 221 U.S.P.Q.2d 1125 (Fed. Cir. 1984).

Furthermore, the Federal Circuit has determined that:

[i]t is impermissible to use the claimed invention as an instruction manual or “template” to piece together the teachings of the prior art so that the claimed invention is rendered obvious. This court has previously stated that “[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention.” In re Fitch, 23 USPQ2d 1780, 1784 (Fed. Cir. 1992).

Further, under Section 103, “it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.” In re Wesslau, 147 USPQ 391, 393 (CCPA 1965). Rather, there must be some suggestion, outside of Applicants’ disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants’ disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, nor any reasonable expectation of success has been shown.

Accordingly, since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for at least this reason, Applicant submits that Claims 1-7 are patentable over Zeiser in view of Hollis et al.

Moreover, and to the extent understood, no combination of Zeiser and Hollis et al. describes a method of mounting an instrument probe wherein a sealing arrangement receives an adapter post therethrough while absorbing axial and radial movement, as recited in Claim

1. Specifically, Claim 1 recites a method of mounting an instrument probe using an adapter post comprising: “coupling an attachment end of the adapter post to a first wall defined between a cavity and an annulus . . . coupling an opposite sealing end of the adapter post to a second wall defined between the annulus and an ambient area . . . sealing the adapter post to compensate for a relative movement between the first wall and the second wall such that a sealing arrangement absorbs axial and radial movement . . . inserting the instrument probe at least partially within the adapter post to monitor a process parameter within the cavity.”

Neither Zeiser nor Hollis et al., considered alone or in combination, describe or suggest a method as recited in Claim 1. Specifically, no combination of Zeiser and Hollis et al. describe nor suggest a method of mounting an instrument probe using a sealing arrangement that receives an adapter post and that facilitates absorbing axial and radial movement. Rather, in contrast to the present invention, Zeiser describes a borescope plug for sealing holes in opposing walls of a gas turbine engine, and Hollis et al. describe sealing holes in a gas turbine engine wherein axial and transverse movement are absorbed by a spring, which does not act as the seal, but rather biases two mating surfaces together. Hollis et al. do not describe an adapter post wherein the sealing arrangement itself absorbs axial and radial movement. As, such no combination of Zeiser and Hollis et al. describes nor suggests the present invention. Accordingly, Applicant submits that Claim 1 is patentable over Zeiser in view of Hollis et al.

Claims 2-7 depend, directly or indirectly, from independent claim 1. When the recitations of Claims 2-7 are considered in combination with the recitations of Claim 1, Applicant submits that Claims 2-7 likewise are patentable over Zeiser in view of Hollis et al.

For at least the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 1-7 be withdrawn.

The rejection of Claims 12-19 under 35 U.S.C § 103(a) as being unpatentable over Zeiser in view of Shah et al. (U.S. 4,132,114) is respectfully traversed.

Zeiser is described above. Shah et al. describe a temperature probe assembly for a gas turbine engine having an upper tube. The upper tube includes a flange (52) with a unitary neck portion (54) and a central opening (56) therethrough. A cap (58) is welded to the upper end of the neck portion (54) and has an aperture extending therethrough to receive an upper hollow shaft (24) of a probe. The aperture is sized and threaded at an opposite end for receiving the probe head (20). A collar member (60) is welded to the end of the shaft (24) to prevent outward withdrawal of the shaft (24). A lower tube (28) includes a collar member (64). A retaining plate (66) including a central aperture (68) is sized to receive all of the lower tube except the collar (64). A coil spring (50) is inserted over the tube to seat against the inner face of the retaining plate. The tube is sized to receive a temperature probe to enable a temperature of a gas turbine engine to be determined. Notably, Shah et al. do not describe a sealing arrangement that facilitates absorbing axial and radial movement, but rather Shah et al. describe inserting a temperature probe into a tube to determine the temperature of a gas turbine engine.

Applicant respectfully submits that obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Zeiser with Shah et al., or vice versa. As explained by the Federal Circuit, “to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the Applicants.” In re Kotzab, 54 USPQ2d 1308, 1316 (Fed. Cir. 2000). MPEP 2143.01.

Furthermore, as is well established, the mere fact that the prior art structure could be modified does not make such a modification obvious unless the prior art suggests the

desirability of doing so. See In re Gordon, 221 U.S.P.Q.2d 1125 (Fed. Cir. 1984).

Furthermore, the Federal Circuit has determined that:

[i]t is impermissible to use the claimed invention as an instruction manual or “template” to piece together the teachings of the prior art so that the claimed invention is rendered obvious. This court has previously stated that “[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention.” In re Fitch, 23 USPQ2d 1780, 1784 (Fed. Cir. 1992).

Further, under Section 103, “it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.” In re Wesslau, 147 USPQ 391, 393 (CCPA 1965). Rather, there must be some suggestion, outside of Applicants’ disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants’ disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, nor any reasonable expectation of success has been shown.

Accordingly, since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for at least this reason, Applicant submits that Claims 12-19 are patentable over Zeiser in view of Shah et al.

Moreover, and to the extent understood, no combination of Zeiser and Shah et al. describes a mounting assembly for mounting an instrument probe wherein a sealing arrangement receives an adapter post therethrough while absorbing axial and radial movement, as recited in Claim 12. Specifically, Claim 12 recites a mounting assembly for mounting an instrument probe within a cavity comprising: “an instrument probe comprising a

probe head coupled to a probe sensor . . . an adapter post comprising an attachment end, a sealing end having a seal ring groove, and a hollow body extending therebetween, said body configured to receive said probe sensor at least partially therein . . . a seal plate comprising an aperture sized to receive said adapter post therethrough . . . a sealing arrangement extending substantially circumferentially around said adapter post, said sealing arrangement configured to absorb axial and radial movement.”

Neither Zeiser nor Shah et al., considered alone or in combination, describe or suggest a mounting assembly as recited in Claim 12. Specifically, no combination of Zeiser and Shah et al. describe nor suggest a sealing arrangement that is fabricated to receive an adapter post and that facilitates absorbing axial and radial movement. Rather, in contrast to the present invention, Zeiser describes a borescope plug for sealing holes in opposing walls of a gas turbine engine, and Shah et al. describe inserting a temperature probe into a tube to determine the temperature of a gas turbine engine. As, such no combination of Zeiser and Shah et al. describes or suggests the present invention. Accordingly, Applicant submits that Claim 12 is patentable over Zeiser in view of Shah et al.

Claims 13-19 depend, directly or indirectly, from independent claim 12. When the recitations of Claims 13-19 are considered in combination with the recitations of Claim 12, Applicant submits that Claims 13-19 likewise are patentable over Zeiser in view of Shah et al.

For at least the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 12-19 be withdrawn.

The rejection of Claims 8-10 under 35 U.S.C § 103(a) as being unpatentable over Zeiser in view of Hollis et al. and further in view of Deak et al. (U.S. 5,662,418) is respectfully traversed.

Zeiser and Hollis et al. are described above. Deak et al. describe a high temperature probe (10) including a probe tube (11) including an upper part (11A) and a lower part (11B). The upper part (11A) has a larger external diameter than the lower part (11B). Probe tube (11) also includes an annular groove (18) which accommodates sealing rings (28). In the region of the annular groove (18), the probe tube (11) is held in a flange (27). In the interior of probe tube (11) there is a first internal drill hole (12) which begins at the upper end of the probe tube (11) and goes into a second internal drill hole (13). The second internal drill hole (13) in turn goes into flow-through channels (14 and 15). Within the probe tube (11) there is also a probe element (20) which includes two ceramic tubes (20a and 20b). The probe tube (11) is closed at the top with a lead-through (19) including a centrally inserted lead-through tube (23) through which wires of the thermocouples (31 and 32) are lead. Notably, Deak et al. do not describe a sealing arrangement that is fabricated to receive an adapter post therethrough while absorbing axial and radial movement, but rather Deak et al. merely describe a probe used to sense temperatures in extreme heat.

Applicant respectfully submits that obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Zeiser with Hollis et al. and Deak et al., or vice versa. As explained by the Federal Circuit, “to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the Applicants.” In re Kotzab, 54 USPQ2d 1308, 1316 (Fed. Cir. 2000). MPEP 2143.01.

Furthermore, as is well established, the mere fact that the prior art structure could be modified does not make such a modification obvious unless the prior art suggests the desirability of doing so. See In re Gordon, 221 U.S.P.Q.2d 1125 (Fed. Cir. 1984). Furthermore, the Federal Circuit has determined that:

[i]t is impermissible to use the claimed invention as an instruction manual or “template” to piece together the teachings



of the prior art so that the claimed invention is rendered obvious. This court has previously stated that “[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention.” In re Fitch, 23 USPQ2d 1780, 1784 (Fed. Cir. 1992).

Further, under Section 103, “it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.” In re Wesslau, 147 USPQ 391, 393 (CCPA 1965). Rather, there must be some suggestion, outside of Applicants’ disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants’ disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, nor any reasonable expectation of success has been shown.

Accordingly, since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for at least this reason, Applicant submits that Claims 8-10 are patentable over Zeiser in view of Hollis et al and Deak et al.

Moreover, Claims 8-10 depend, directly or indirectly, on independent Claim 1. To the extent understood, no combination of Zeiser, Hollis et al., and Deak et al. describes a method of mounting an instrument probe wherein a sealing arrangement receives an adapter post therethrough while absorbing axial and radial movement, as recited in Claim 1. Specifically, Claim 1 recites a method of mounting an instrument probe using an adapter post comprising: “coupling an attachment end of the adapter post to a first wall defined between a cavity and an annulus . . . coupling an opposite sealing end of the adapter post to a second wall defined between the annulus and an ambient area . . . sealing the adapter post to

compensate for a relative movement between the first wall and the second wall such that a sealing arrangement absorbs axial and radial movement . . . inserting the instrument probe at least partially within the adapter post to monitor a process parameter within the cavity.”

Neither Zeiser, Hollis et al. nor Deak et al., considered alone or in combination, describe or suggest a method as recited in Claim 1. Specifically, no combination of Zeiser, Hollis et al. or Deak et al. describe nor suggest a method of mounting an instrument probe wherein a sealing arrangement receives an adapter post therethrough while absorbing axial and radial movement. Rather, in contrast to the present invention, Zeiser describes a borescope plug for sealing holes in opposing walls of a gas turbine engine, and Hollis et al. describe sealing holes in a gas turbine engine wherein axial and transverse movement are absorbed by a spring, which does not act as the seal, but rather biases two mating surfaces together. Hollis et al. do not describe an adapter post wherein the sealing arrangement itself absorbs axial and radial movement. Deak et al. merely describe a probe used to sense temperatures in extreme heat. As, such no combination of Zeiser, Hollis et al., or Deak et al. describes or suggests the present invention. Accordingly, Applicant submits that Claim 1 is patentable of Zeiser in view of Hollis et al. and further in view of Deak et al.

Claims 8-10 depend, directly or indirectly, from independent claim 1. When the recitations of Claims 8-10 are considered in combination with the recitations of Claim 1, Applicant submits that Claims 8-10 likewise are patentable over Zeiser in view of Hollis et al. and further in view of Deak et al.

For at least the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 8-10 be withdrawn.

The rejection of Claim 11 under 35 U.S.C § 103(a) as being unpatentable over Zeiser in view of Hollis et al. and further in view of Shah et al. (U.S. 5,662,418) is respectfully traversed.

Zeiser, Hollis et al., and Shah are described above.

Applicant respectfully submits that obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Zeiser with Hollis et al. and Shah et al., or vice versa. As explained by the Federal Circuit, “to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the Applicants.” In re Kotzab, 54 USPQ2d 1308, 1316 (Fed. Cir. 2000). MPEP 2143.01.

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Further, under Section 103, “it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.” In re Wesslau, 147 USPQ 391, 393 (CCPA 1965). Rather, there must be some suggestion, outside of Applicants’ disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants’ disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, nor any reasonable expectation of success has been shown.

Accordingly, since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for at least this reason, Applicant submits that Claim 11 is patentable over Zeiser in view of Hollis et al and Shah et al.

Moreover, Claim 11 depends, directly or indirectly, on independent Claim 1. To the extent understood, no combination of Zeiser, Hollis et al., and Shah et al. describes a method of mounting an instrument probe wherein a sealing arrangement receives an adapter post therethrough while absorbing axial and radial movement, as recited in Claim 1. Specifically, Claim 1 recites a method of mounting an instrument probe using an adapter post comprising: “coupling an attachment end of the adapter post to a first wall defined between a cavity and an annulus . . . coupling an opposite sealing end of the adapter post to a second wall defined between the annulus and an ambient area . . . sealing the adapter post to compensate for a relative movement between the first wall and the second wall such that a sealing arrangement absorbs axial and radial movement . . . inserting the instrument probe at least partially within the adapter post to monitor a process parameter within the cavity.”

Neither Zeiser, Hollis et al. nor Shah et al., considered alone or in combination, describe or suggest a method as recited in Claim 1. Specifically, no combination of Zeiser, Hollis et al. or Shah et al. describe nor suggest a method of mounting an instrument probe wherein a sealing arrangement receives an adapter post therethrough while absorbing axial and radial movement. Rather, in contrast to the present invention, Zeiser describes a borescope plug for sealing holes in opposing walls of a gas turbine engine, and Hollis et al. describe sealing holes in a gas turbine engine wherein axial and transverse movement are absorbed by a spring, which does not act as the seal, but rather biases two mating surfaces together. Hollis et al. do not describe an adapter post wherein the sealing arrangement itself absorbs axial and radial movement. Shah et al. describe inserting a temperature probe into a

tube to determine the temperature of a gas turbine engine. As, such no combination of Zeiser, Hollis et al., or Shah et al. describes or suggests the present invention. Accordingly, Applicant submits that Claim 1 is patentable over Zeiser in view of Hollis et al. and further in view of Shah et al.

Claim 11 depends, directly or indirectly, from independent claim 1. When the recitations of Claim 11 are considered in combination with the recitations of Claim 1, Applicant submits that Claim 11 likewise is patentable over Zeiser in view of Hollis et al. and further in view of Shah et al.

For at least the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claim 11 be withdrawn.

The rejection of Claim 20 under 35 U.S.C § 103(a) as being unpatentable over Zeiser in view of Shah et al. (U.S. 4,132,114) is respectfully traversed.

Zeiser and Shah et al. are described above.

Applicant respectfully submits that obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Zeiser with Shah et al., or vice versa. As explained by the Federal Circuit, “to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the Applicants.” In re Kotzab, 54 USPQ2d 1308, 1316 (Fed. Cir. 2000). MPEP 2143.01.

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Further, under Section 103, “it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.” In re Wesslau, 147 USPQ 391, 393 (CCPA 1965). Rather, there must be some suggestion, outside of Applicants’ disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants’ disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, nor any reasonable expectation of success has been shown.

Accordingly, since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for at least this reason, Applicant submits that Claim 20 is patentable over Zeiser in view of Shah et al.

Moreover, and to the extent understood, no combination of Zeiser and Shah et al. describes a mounting assembly for mounting a temperature probe wherein a sealing arrangement receives an adapter post therethrough while absorbing axial and radial movement, as recited in Claim 20. Specifically, Claim 20 recites a mounting assembly for mounting a temperature probe to a gas turbine engine comprising: “a temperature probe comprising a probe head coupled to a probe sensor extending from said probe head, said probe sensor comprising an elongate body and a damper coil wire helically-wound around at

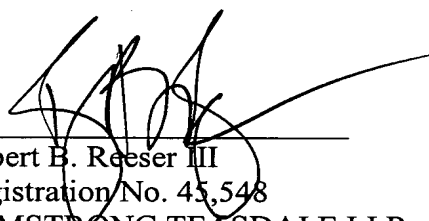
least a portion of said body . . . an adapter post comprising an attachment end configured to couple to the gas turbine engine, a sealing end comprising a circumferential seal groove configured to receive a seal ring partially therein to facilitate sealing contact between said sealing end and a wall, and a hollow body extending between said sealing end and said seal ring, said body sized to receive at least a portion of said probe sensor therein . . . a seal plate comprising an aperture sized to receive said adapter post therethrough, a first face, and an opposing second face, at least one said first face and said second face comprises a circumferential seal groove circumscribing said aperture, said seal groove sized to receive at least a portion of a seal ring therein . . . a sealing arrangement extending substantially circumferentially around said adapter post, said sealing arrangement configured to absorb axial and radial movement.”

Neither Zeiser nor Shah et al., considered alone or in combination, describe or suggest a mounting assembly as recited in Claim 20. Specifically, no combination of Zeiser and Shah et al. describe or suggest a mounting assembly for mounting a temperature probe wherein a sealing arrangement is fabricated to receive an adapter post therethrough while absorbing axial and radial movement. Rather, in contrast to the present invention, Zeiser describes a borescope plug for sealing holes in opposing walls of a gas turbine engine, and Shah et al. describe inserting a temperature probe into a tube to determine the temperature of a gas turbine engine. As, such no combination of Zeiser and Shah et al. describes or suggests the present invention. Accordingly, Applicant submits that Claim 20 is patentable over Zeiser in view of Shah et al.

For at least the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claim 20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'Robert B. Reeser III', is written over a horizontal line.

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